



OFFICE OF THE  
**ORANGE COUNTY DISTRICT ATTORNEY**

COUNTY GOVERNMENT CENTER  
255-275 MAIN STREET, GOSHEN, NEW YORK 10924-1627  
TEL: 845-291-2050 • FAX: 845-378-2370  
www.orangecountygov.com\DA

DAVID M. HOOVLER  
District Attorney

July 1, 2025

Hon. Kenneth M. Karas  
United States District Court  
300 Quarropas Street  
White Plains, New York 10601

Re: Garry Michel v Lynn Lilly, Superintendent  
2025-CV-0921 (KMK)

Your Honor,


Please accept this letter as an application made pursuant to Local Rule 6.1 to file certain additional records that are relevant to the pending federal habeas corpus proceeding under seal. On June 25, 2025, the Court granted Respondent's application to file a letter, an unredacted copy of the sentencing transcript and a copy of the presentence report under seal. In preparing the response to the petition, the undersigned located additional records that I believe should also be filed under seal, including copies of a proffer and cooperation agreement. I also learned that the appellate briefs that were filed in the Appellate Division were not made available for public viewing pursuant to an Appellate Division Order (see attached). Accordingly, Respondent believes that it is necessary and appropriate to file these additional records with the Court under seal, thereby protecting petitioner's safety.

We believe that the most expeditious means of seeking leave of the Court to file such records under seal is by this letter, with a so-ordered provision. This application supplements the prior application.

The Court's cooperation is appreciated.

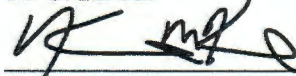
Very truly yours,

DAVID M. HOOVLER  
DISTRICT ATTORNEY

  
ANDREW R. KASS  
Executive Assistant District Attorney  
(AK 0470)

Upon review of the above application, Respondent is granted leave to file copies of appellate briefs as well as unredacted copies of the proffer and cooperation agreement with the Court under seal.

So Ordered:

  
Hon. Kenneth M. Karas  
United States District Judge

7/1/25

cc: Garry Michel, Pro Se